

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED: **10/13/16**
U.S. DISTRICT COURT
EASTERN DISTRICT COURT
DAVID A. O'TOOLE, CLERK

UNITED STATES OF AMERICA	§	
	§	No. 4:14CR173
v.	§	Judge Mazzant
	§	
JUAN JOSE RODRIGUEZ JR. (5)	§	

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

Count One

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with Intent to
Distribute Cocaine)

That from sometime in or about June 2013 to sometime in or about November 2015, in the Eastern District of Texas and elsewhere, **Juan Jose Rodriguez Jr.**, the defendant herein, did knowingly and intentionally combine, conspire, and agree with other persons known and unknown to the United States Attorney, to knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
Criminal Forfeiture Pursuant to 21 U.S.C. § 853

As a result of committing the offenses charged in this Information, the defendant shall forfeit to the United States all property, real and personal, involved in the offenses alleged or traceable to such property, and all property, real or personal, used to commit or facilitate the offenses alleged, including, but not limited to, the following:

Personal Property

1. 2013 Blue Nissan Sentra: Illinois license plate Y82-6857: VIN 3N1AB7AP3DL716647;
2. 2013 Gray Nissan Sentra: Illinois license plate Y91-5792: VIN 8N1AB7AP6DL619569;
3. 2013 White GMC Terrain: Oklahoma license plate 873-LGO: VIN 2GKFLYE30D6321914;
4. 2014 Black Chevrolet: Texas dealer plate 97125457: VIN 3GCPCREC5EG107772;
5. 2007 Silver Honda Civic: Texas license plate DLN-7389: VIN 1HGFA16867L029863;
6. 2014 White Honda Civic: Texas license plate 52C9514: VIN 19XFB2F85EE072243;
7. 2007 Gray Jeep Cherokee: Oklahoma license plate 213-GVZ: VIN 1J8GS48K27C616998;
8. 2009 Blue Ford Ranger: Texas temporary plate 20M3431: VIN 1FTYR10D29PA56446;
9. 2009 Black BMW: Texas license plate DGK-6670: VIN WBAWL13519PX25025;

10. 2013 White Nissan Rogue: Tennessee license plate W05-82W: VIN JN8AS5MT3DW551708;
11. 2014 Gray Jeep, VIN 1C4PJLCB1EW172102;
12. 2014 Silver Nissan Sentra: Texas license plate GFF-4816: VIN 3N1AB7AP7EY294922;
13. 2008 White Nissan Sentra: Illinois license plate Z52-3405: VIN 8N1AB61E48L685150;
14. \$20,400 in U.S. currency obtained from the Ines Simon Blanco and Gustavo Cedillo on 11/3/2015;
15. \$49,982 in U.S. currency seized from Ines Simon Blanco and Gustavo Cedillo on 11/4/2015;
16. \$14,900 in U.S. currency obtained from Humberto Garcia, a/k/a "Pone" on 11/9/2015;
17. \$80,200 in U.S. Currency obtained from Eliseo Cabrales, a/k/a "Alacran" on 11/10/2015;
18. \$9,600 in U.S. Currency seized from 1631 Melbourne, Dallas, Texas on 11/13/2015;
19. \$5,863 in U.S. Currency seized from Rigoberto Rodriguez, a/k/a "Primo" on 11/13/2015;
20. \$174,240 in U.S. Currency obtained from E.M., the property of Rigoberto Rodriguez, a/k/a "Primo" between 11/24/2015 and 12/4/2015;
21. \$20,000 in U.S. Currency seized from Carlos Agustin Carreon-Vega on 12/1/2015;
22. \$3,000 in U.S. Currency seized from Daniel Ramirez on 2/9/2016;

Firearms

23. Kel-tec 380 handgun, serial number JY956;
24. Taurus Model 1911 handgun, 9MM, serial number LBX05350;
25. Colt M4 Carbine, Serial # LE245076;

Proceeds

26. Cash proceeds in the amount of \$98,000,000 in United States currency and all interest and proceeds traceable thereto.

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of any defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(a)(4), to seek forfeiture of any other property of each defendant up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by each defendant.

By virtue of the commission of the offenses alleged in this Information, any and all interest that each defendant has in the above-described property is vested in and hereby forfeited to the United States.

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

BRIT FEATHERSTON
Acting United States Attorney

A handwritten signature in black ink, appearing to read "JAY R. COMBS", is written over a horizontal line.

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NOTICE OF PENALTY

Count One

VIOLATION: 21 U.S.C. § 846

PENALTY: Imprisonment for not less than five years or more than 40 years, a fine not to exceed \$5,000,000.00 or both. A term of supervised release of at least four (4) years.

SPECIAL
ASSESSMENT: \$100.00